

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Lenora Dashawn Calliway

Case: 2:21-mj-30380

Case No. Assigned To : Unassigned

Assign. Date : 8/5/2021

SEALED MATTER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 5/6/20 to 1/26/21 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1349

Conspiracy to Commit Wire Fraud

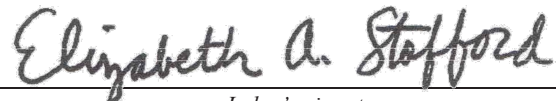
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 5, 2021

City and state: Detroit, MI

*Complainant's signature*Jeffrey Weiland- Special Agent*Printed name and title**Judge's signature*Elizabeth A. Stafford- U.S Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jeffrey Weiland, being duly sworn, states as follows:

YOUR AFFIANT'S BACKGROUND, TRAINING AND EXPERIENCE

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since September 2007. I am currently assigned to the Public Corruption and Government Fraud squad in the Detroit Division of the FBI. As a Special Agent, I have investigated crimes including the corruption of state and local officials, arson, forced labor trafficking, racketeering and violations of the Foreign Agents Registration Act. During these investigations, I have been the affiant on search warrants for businesses, residences and electronic mail (e-mail) accounts. I have also conducted investigations using consensual recordings, undercover operations, Title III wiretaps and techniques authorized under the Foreign Intelligence Surveillance Act (FISA).

PURPOSE OF AFFIDAVIT

2. This affidavit is submitted in support of a criminal complaint for Lenora Dashawn CALLIWAY, date of birth 04/XX/1986, for violating 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud). Based on the facts set forth in this affidavit, there is probable cause to believe that CALLIWAY conspired, or agreed, to commit the crime of wire fraud, and other federal crimes, with Sharodney Marteze Harrison ("Sharodney"). Furthermore, CALLIWAY knowingly and

voluntarily joined the conspiracy.

3. The information contained in this affidavit is based upon my personal knowledge obtained through participating in this investigation as well as information I received from the Michigan Unemployment Insurance Agency (MUIA), U.S. Department of Labor, Federal Grand Jury subpoenas, court orders issued pursuant to 18 U.S.C. § 2703(d), search warrants and interviews.

4. Since this affidavit is being submitted for the limited purpose of establishing probable cause that CALLIWAY violated 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud), I have not included each and every fact known to me concerning this investigation.

BACKGROUND ON INVESTIGATION

5. The FBI and Department of Labor-Office of Inspector General (DOL-OIG) are investigating CALLIWAY, Sharodney and other individuals known and unknown for defrauding the State of Michigan and other states out of federal dollars earmarked for Pandemic Unemployment Assistance (PUA). The investigation began with a focus on more than one hundred claims for Unemployment Insurance (UI) that had been filed with the State of Michigan from two Internet Protocol (IP) addresses - 68.34.90.152, assigned to XX46 Quinn Street Lowr, Detroit, Michigan 48234 and 68.42.157.111 assigned to XX203 Steel Street, Detroit, Michigan 48235. Sharodney resides at XX46 Quinn Street.

6. On January 26, 2021, Agents from the FBI and DOL-OIG executed search warrants at XX46 Quinn Street, the residence of Sharodney, and XX203 Steel Street, the residence of Seandrea Crawford. Agents found paper and electronic evidence of UI fraud at both locations, including text messages between CALLIWAY and Sharodney in furtherance of their conspiracy to commit wire fraud.

PROBABLE CAUSE

A. Background on Unemployment Insurance Program

7. The Social Security Act of 1935 initiated the federal and state UI system. The system provides benefits to individuals who are unemployed for reasons beyond their control. The purpose of the UI system is twofold: first, to lessen the effects of unemployment through cash payments made directly to laid-off workers, and second, to ensure that life necessities are met on a weekly basis while the worker seeks employment. In Michigan, the UI system is administered by the MUIA, which is part of the Michigan's Department of Labor and Economic Opportunity. Other States administer their UI programs through similar state run agencies. Regardless of state, the U.S. Department of Labor funds each of the respective state agency's administrative costs, including salaries, office expenses, and computer equipment.

8. State unemployment systems and benefits are largely financed by

taxes on private employers located in that state. When state unemployment benefits are exhausted, they may be supplemented by federal funds appropriated by the U.S. Department of Labor.

9. As of the time of this application, the federal government is providing significant supplemental benefits to the states as a result of the COVID-19 pandemic. Beginning in or about March 2020 and continuing through the present, the Families First Coronavirus Response Act (FFCRA); Coronavirus Aid, Relief, and Economic Security (CARES) Act; and American Rescue Plan Act of 2021 (ARPA) have created federal programs that allowed for the significant outlay of federal funds flowing to and through the states to offset the historic needs for unemployment benefits by the American workforce, including the State of Michigan and in the Eastern District of Michigan. Collective, these benefits are often referred to as Pandemic Unemployment Assistance (PUA).

10. Normally, in the absence of fraud, an unemployed worker initiates an UI claim in person, over the telephone, or on the Internet. Currently, the overwhelming majority of UI claims are filed online through a state website. In order to be eligible for UI benefits, the worker must demonstrate a certain level of earnings in several quarters immediately preceding the application. The amount of unemployment benefits that a UI claimant might be eligible for depends on a variety of factors, including but not limited to the length of his or her previous

employment and the amount of wages he or she earned.

11. The state agency will either approve or reject a UI claim based on the application made by the unemployed worker. If the state agency approves a UI claim, the claimant is required to re-certify the claim via telephone or Internet at various times during the life of the claim. The worker must also certify that he or she is still unemployed and actively seeking work. One way in which unemployment benefits are provided to a claimant is through the use of a debit card, issued by the Bank of America (BOA) in Michigan, which is mailed to the claimant through the U.S. Postal Service. The unemployment benefits are loaded onto the debit card electronically. Alternatively, a worker can provide the state agency with a bank routing number and bank account in which to have their unemployment benefits directly deposited electronically. In either case, additional benefits are loaded electronically at intervals thereafter. The Bank of America centers used to process Michigan's UI claims are located in Virginia and Texas.

12. In an effort to prevent and otherwise inhibit fraud, the state agencies capture certain data surrounding the interaction between an individual and the UI system. Each time a claim is accessed in the system, it creates a digital footprint of sorts. Although states utilize their own unique systems, many times the data that is collected includes the dates, times, Internet Protocol (IP) address, and Media Access Control (MAC) address associated with a device accessing a claim. The

state systems tie this information to the user-entered information captured to facilitate the claim (i.e. name, address, social security number, BOA or other bank account numbers, bank routing numbers, etc.). It is through the analysis of this data that the state agencies and investigating agents can identify fraudulent trends and tendencies associated with certain claims.

B. Search Warrants Executed at XX46 Quinn Street and XX203 Steel Street

13. On January 26, 2021, the FBI and DOL-OIG executed search warrants at XX46 Quinn Street and XX203 Steel Street. Agents found paper and electronic evidence of UI fraud at XX203 Steel Street. At XX46 Quinn Street, agents seized debit cards and UI claims information in the name of more than twenty-five people. Agents also seized four cellular telephones and a laptop computer. During a voluntary interview with agents, Sharodney admitted a number of facts regarding his scheme to file false UI claims. Sharodney admitted that he used people's personal information to file claims without their knowledge or consent. Sharodney admitted that he paid people to have UI claims and debit cards sent to their homes. Sharodney, however, would not identify other participants in the scheme.

14. Evidence collected in this investigation, including text messages found on Sharodney's cellular telephones, shows that in order to facilitate and conceal the UI fraud, Sharodney worked with other individuals including

CALLIWAY. Among the actions taken by those individuals to further the goals of the conspiracy were: (1) creating e-mail accounts to link with UI claims, (2) submitting UI claims, (3) re-certifying the UI claims, (4) using their telephone numbers to verify identity, (5) creating online bank accounts in which the UI benefits were deposited, (6) collecting mail for the UI claims and (7) collecting mail with pre-paid cards on which UI benefits had been deposited.

C. Lenora Deshawn CALLIWAY

15. Agents reviewed three of Sharodney's cellular telephones seized from XX46 Quinn Street. Sharodney had messages on his cellphones from telephone number 586-XXX-4831. In his contacts, Sharodney identified 586-XXX-4831 as belonging to Lenora. A Michigan UI claim in the name of Lenora CALLIWAY listed the claimant's telephone number as 586-XXX-4831. On 03/16/2021 and 07/20/2021, a white Town & Country van was observed at 20063 Irvington Street, Highland Park, Michigan. The van is registered to Lenora Dashawn CALLIWAY, date of birth 04/24/1986. CALLIWAY's Michigan Driver's License lists a different address.

16. On 05/06/2020, CALLIWAY and Sharodney exchanged text messages:

Sharodney: Send mw ur bro address

Sharodney: Plz be on the mail

Lenora: Ok I got u

Sharodney: Wats that address

Lenora: 20063

Sharodney: U sure

Sharodney: (emoji with zipper lips) plz don't tell nobody my business

Lenora: Nobody knows about this but yo yo [two emojis with zipper lips]

Eight Michigan UI claims listed 20063 Irvington Street, Highland Park, Michigan as the mailing address. The State of Michigan paid \$46,048 on those claims. I believe Sharodney was telling CALLIWAY to be on the mail so that no one else would see all the UI letters being sent to the address. CALLIWAY knew that the mailings were from fraudulent UI claims, which is why she reassured Sharodney that only "yo yo" knows about this.

17. On 08/30/2020, CALLIWAY and Sharodney exchanged text messages:

Lenora: 20069 Irvington highland park mi 48203

Sharodney: That's next door

Lenora: Yes

Five Michigan UI claims listed 20069 Irvington Street, Highland Park, Michigan as the mailing address. The State of Michigan paid \$26,118 on those claims. In other text messages, CALLIWAY wrote that she was retrieving the mail

sent to 20069 Irvington.

18. On 10/10/2020, CALLIWAY and Sharodney exchanged text messages:

Sharodney: wats ur address

Sharodney: So u can get sum of this new money

Lenora: 20063 Irvington 48203

Sharodney: Ok

I believe Sharodney was referring to new money from fraudulent UI claims because shortly thereafter CALLIWAY received a prepaid debit card to her address.

19. On 10/21/2020, CALLIWAY and Sharodney exchanged text messages:

Lenora: [image of an envelope from BRINKS MONEY, addressed to [VW], 20063 Irvington St, Highland Park, MI 48203]

Lenora: Is this what u looking for

Sharodney: Yep keep it an a green dot

Lenora: That's all that came

Sharodney: Ok

Brinks Money is another prepaid card similar to Netspend and Green Dot on which Sharodney directed funds from fraudulent UI claims to be deposited.

20. On 01/21/2021, CALLIWAY and Sharodney exchanged text

messages:

Sharodney: Any letter u get from unemployment for the state of Michigan I need them

Sharodney: Check that address next door

Lenora: Ok

Lenora: I think I got some there

Sharodney: Ok I need them how many

Lenora: Not sure but they been coming I think 2 or 3 I'll check I'm at my moms

Sharodney: Ok

Sharodney: Ok it should be more

Lenora: I need a 1000\$ a letter [two crying laughing emojis]

Sharodney: Here u go

Sharodney: All of them are w2s gurl u terrible

Lenora: Big mama need to eat to [three crying laughing emojis]

Sharodney: Send me that address so I can send sum mail next door

Lenora: I can't get the mail no more she moved the mailbox to inside slot to the door now

Sharodney: Oh ok dam

As recently as 01/21/2021, CALLIWAY was writing that she received Michigan UI letters on behalf of Sharodney. CALLIWAY was telling Sharodney that she wanted \$1,000 for each letter she received. I believe CALLIWAY

demanded this amount because she knew that the letters represented false UI claims filed by Sharodney. I believe CALLIWAY had used her neighbor's address without consent so that no one would see the volume of letters coming to her address. The neighbor, however, moved the mailbox so CALLIWAY could no longer get the mail at 20069 Irvington.

21. Thirteen Michigan UI claims totaling more than \$70,000 listed the claimant's address as either 20063 Irvington or 20069 Irvington. As to claims filed with the State of Michigan, all payments are processed through Bank of America centers located in Virginia and Texas. Thus, when receiving payments on Michigan UI claims, I believe that CALLIWAY or Sharodney used wire communications or caused another to use wire communications in interstate commerce in furtherance of the scheme.

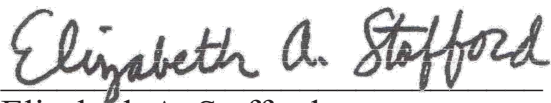
CONCLUSION

22. Based on the foregoing information, there is probable cause to believe that CALLIWAY conspired, or agreed, to commit the crime of wire fraud and that CALLIWAY knowingly and voluntarily joined the conspiracy. Therefore, there is probable cause to believe that CALLIWAY violated 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud).

A handwritten signature in blue ink that reads "Jeff Weiland". The signature is written in a cursive style with a large, stylized "J" and "W".

Special Agent Jeffrey Weiland
Federal Bureau of Investigation

Subscribed and sworn to before me
or by reliable electronic means
this 5th day of August, 2021:

A handwritten signature in black ink that reads "Elizabeth A. Stafford". The signature is written in a cursive style with a large, stylized "E" and "S".

Elizabeth A. Stafford
United States Magistrate Judge